



18 July 2014

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band, ET Docket No. 13-49

Comments in Support of Petition for Reconsideration of WISPA, Cambium, Mimosa Networks and JAB

Dear Ms. Dortch:

Our company is a small wireless Internet service provider located in Baltimore, Maryland. Unlike most WISPs, we serve a high-density, urban market. However, we share the concerns of other members of WISPA, that proposed changes to Section 15.247 would have a serious adverse impact on our company and our customers.

Consumers choose to get Internet access from our company because we offer an alternative to the dominant provider in our region, Comcast. We are able to compete against that behemoth largely because we have access to affordable communications equipment and the unlicensed 5725-5850 MHz band.

The proposed elimination of Section 15.247 would force manufacturers to incorporate expensive filters into existing designs, dramatically increasing the cost of the equipment we rely on. This change would also limit the frequencies available for our use, at a time when our business is already starved for spectrum.

Most of our customers are served by point-to-multipoint equipment, set up in clusters atop tall buildings downtown. We need at least three 40MHz bands of spectrum to keep neighboring access points from interfering with each other. With less spectrum available, we'd have no way to operate the same number of access points.

The overall effect? We would end up being an even smaller player in this market, meaning that more customers would have only one real choice for Internet access. As Internet access becomes more and more central to both work and leisure, that kind of effective monopoly becomes increasingly hard on consumers.

PORT NETWORKS, INC.

World Trade Center of Baltimore · 401 East Pratt Street, 25th Floor, Baltimore, MD 21202

Please reconsider the proposed elimination of Section 15.247. Our business depends on continued access to affordable equipment and unlicensed spectrum, and our customers depend on us continuing on as an alternative to Big Cable.

Sincerely,

A handwritten signature in black ink, appearing to read "Hugh R Bethell". The signature is fluid and cursive, with the first name "Hugh" and last name "Bethell" clearly distinguishable.

Hugh Bethell
General Manager